

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**THE MUNICIPALITY OF SAN JUAN  
PUERTO RICO,**

*Plaintiff,*

v.

**EXXON MOBIL CORP. et al.,**

*Defendants.*

Case No. 3:23-cv-01608-ADC

**MOTION FOR JOINDER**

**TO THE HONORABLE COURT:**

**NOW APPEARS** Defendant, Occidental Petroleum Corporation (“OPC”), through its undersigned counsel, and respectfully requests and states as follows:

Several motions are pending before this Court, including OPC’s Motion to Dismiss (Docket No. 28) and many other motions to dismiss filed by other defendants to this case. Besides its own Motion to Dismiss, OPC also joined the Joint Defense Motions to Dismiss at Docket Nos. 31 and 34. Defendants, including OPC, have filed a joint motion to deem these motion unopposed. *See Defendants’ Motion to Deem Motions to Dismiss and Related Motions Unopposed*, Dkt. No. 41. That motion is *sub judice*.

OPC’s Motion to Dismiss remains unopposed. For this reason, OPC joins the motion filed by Defendants at Docket No. 67 with respect to the renewed request that the Court deem Defendants’ motions to dismiss submitted and unopposed.

**WHEREFORE**, it is respectfully requested that this Honorable Court note OPC’s joinder to the submission filed by Defendants at Docket No. 67 with respect to the relief requested deeming OPC’s motion submitted and unopposed but not the relief requested by Plaintiffs in Dkt. No. 52,

upon which OPC takes no position.

Certification: I hereby certify that, on this same date, I electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico this 7<sup>th</sup> day of June, 2024.

By: s/ David Indiano  
David Indiano  
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